

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WOODS HOLE OCEANOGRAPHIC
INSTITUTION,

Plaintiff,

v.

ATS SPECIALIZED, INC., RIDGEWAY
INTERNATIONAL USA, INC., GUY TOMBS
LIMITED, AUSTRALIAN NATIONAL
MARITIME MUSEUM, SAM BROUGHTON
WRIGHT, JR., SERVICE TIRE TRUCK
CENTER, INC., AND TRAVELCENTERS OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-12301-NMG

**MOTION OF AUSTRALIAN NATIONAL MARITIME MUSEUM TO DISMISS THE
COMPLAINT FOR LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION**

Pursuant to Rule 7 of the Local Rules of this Court and Rules 12(b)(1) and 12(b)(2) of the Federal Rules of Civil Procedure, Australian National Maritime Museum, appearing specially and not generally, moves to dismiss the complaint herein for lack of subject matter jurisdiction and lack of personal jurisdiction.

The Australian National Maritime Museum also moves for such other and further relief as may be appropriate.

REQUEST FOR ORAL ARGUMENT

The Australian National Maritime Museum respectfully requests oral argument on this motion.

Respectfully submitted,

AUSTRALIAN NATIONAL MARITIME
MUSEUM

By: Its Attorneys

/s/ Chad M. Vacarella

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Date: July 27, 2018

/s/ Forrest Booth

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CERTIFICATE OF SERVICE

I, Chad M. Vacarella, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and sent by first class mail to all others on July 27, 2018.

/s/ Chad M. Vacarella

Chad M. Vacarella